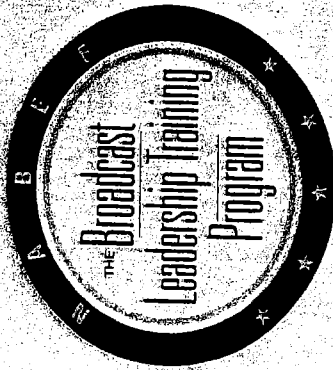


THE NATIONAL ASSOCIATION OF BROADCASTERS EDUCATION FOUNDATION


Recognizes Jordan Wertlieb




FOR SUCCESSFULLY COMPLETING THE 2002-2003
BROADCAST LEADERSHIP TRAINING PROGRAM

*As you take your place in the future of broadcasting,
use the knowledge you have gained to uphold the
highest standards of our industry.*


EDWARD O. FRITTS
President & CEO, National Association of Broadcasters


CHARLES E. SHERMAN
President, NABEF


DIANE SUTTER
Founder, Broadcast Leadership Training Program

Tomorrows Leaders

A Report of the Broadcast Leadership Class of 2003

April 2003

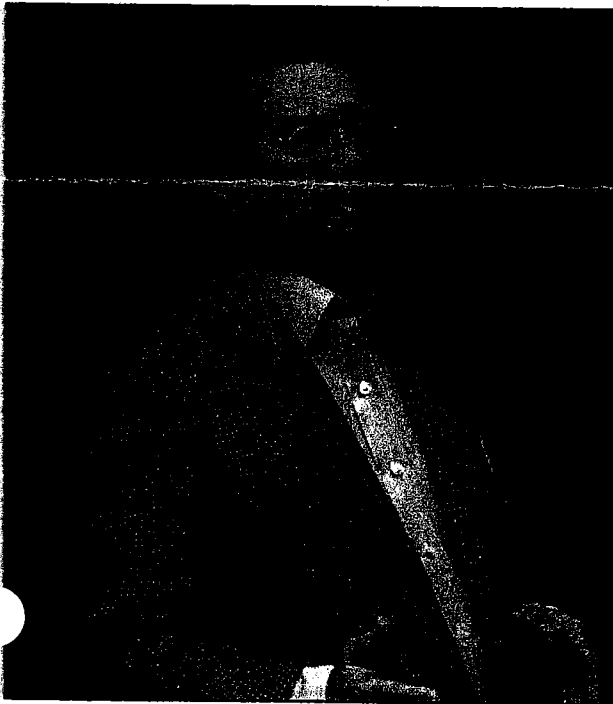


The Program

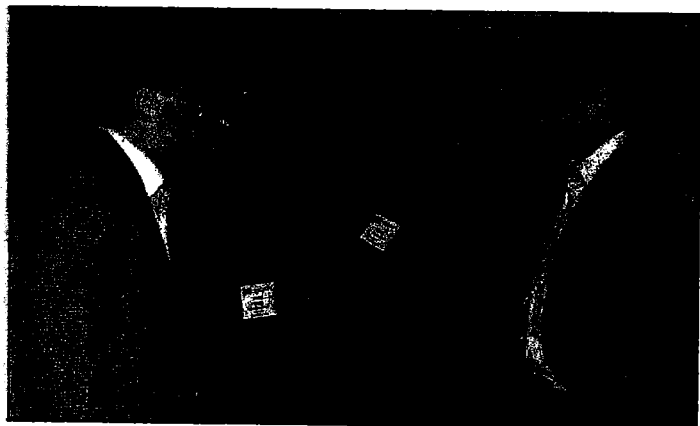
The Broadcast Leadership Training Program was created to promote diversity and upward mobility for women and minorities in broadcast management. It targets senior level broadcast managers of proven ability who aspire to advance as group executives or station owners. The program follows the model of weekend MBA courses, meeting one weekend a month at NAB for 10 months, beginning in September 2002 and concluding June 2003.

The Kick-Off — First Weekend

The NAB Education Foundation successfully launched the third year of the Broadcast Leadership Training Program on September 27-29. Weekend One's agenda set the groundwork for the curriculum covered in the remaining nine weekends. Attendees participated in one and a half days of sessions on accounting and finance taught by faculty from Northwestern University. These sessions and case studies provided skills and raised issues revisited in future meetings.



NAB President Eddie Fritts welcomes the class.



Eddie Fritts with Jenell Trigg, Leventhal, Senter & Lerman; Karen Kirsch, NAB and Peter Pappas, Pappas Telecasting.

The Second Weekend

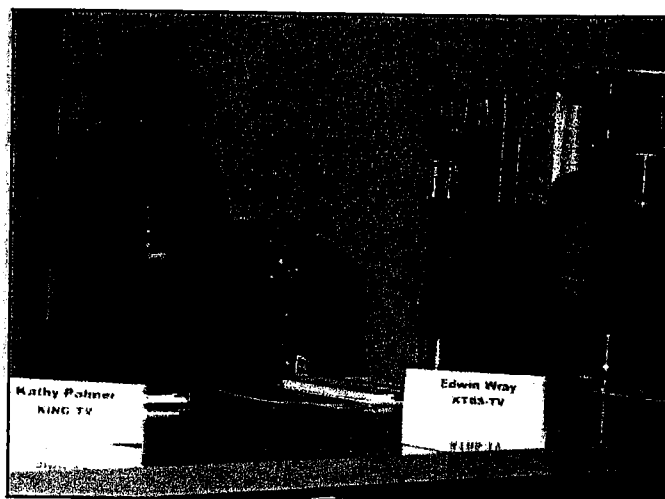
Dick Wiley, former FCC chairman and senior partner, Wiley Rein and Fielding kicked off the October 25-27 weekend when he provided his insights into broadcasting, including his views on the current make-up of the FCC and the future of digital television. On Saturday morning Joe Reiser from Reed Smith provided the framework for setting up a company. The class reviewed the characteristics of corporate organizations to determine which types fit within particular business models, and ultimately, how to put together their own corporate structure. The remainder of the weekend focused on selecting and working with consulting engineers and legal counsel. This session featured Jerry Fritz, corporate vice president, legal and strategic affairs, Allbritton Communications and an NAB board member; Gregg Skall, partner, Womble Carlyle; and Gary Cavell, Richard Mertz and Mark Peabody, Cavell, Mertz and Davis.

The Third Weekend

The class reconvened for a third time on November 15-17 when Jeff Kilrea, Capital Source and Bob Emmert, Alta Communications began the weekend with a candid discussion on acquiring station funding. During the remainder of the weekend a number of equity partners, financial advisors and venture capitalists spoke to the class about researching and selecting financial lenders, what to present during a "Road Show," and how to create a business plan. Sessions focused primarily on the types of funding available, how to determine which type works best for the buyer and how to negotiate the equity deal. On Sunday, the class completed a case study by answering a series of questions on setting up a company that combined the information presented on corporate organization and financing. Faculty included representatives from Crest Advisors, Textron Financial Corporation and BIA.

The Fourth Weekend

Weekend four sessions, December 13-15, focused on selecting and working with brokers, prospecting and deal flow, due diligence and strategy. Dex Allen, president and CEO, Commonwealth Communications, began the weekend on Friday evening with his own list of rules on becoming an entrepreneur. On Saturday morning, broker Glenn Serafin, president of Serafin Bros. told the class about the broker/buyer relationship. He explained that once a strategic business plan has been developed and finances are in order, a broker helps locate stations that



Program Dean Diane Sutter, Shooting Star Broadcasting, with participants Edwin Wray, KTBS-TV and Araceli De Leon, KDRX and KHRR.

meet the buyer's needs. Dex Allen returned to instruct the class on prospecting potential stations and describe what to expect during the deal flow. On Saturday afternoon Diane Sutter and Sam Bush, CFO, Saga Communications, discussed the due diligence process and explained how a properly developed checklist is useful when evaluating a station's worth. Drew Davis, director, Media Management Center, wrapped up the weekend with a session on strategy. He identified changes occurring in the industry and urged the class to incorporate them into their everyday station operations.



The Class of 2003 with FCC Commissioner Copps and NAB President/CEO Eddie Fritts (center).

The Fifth Weekend

During the January 24-26 weekend, the participants were honored to have FCC Commissioner Michael J. Copps address the class at the Friday evening reception. He offered his perspective on family friendly programming and diversity in media. He voiced his concerns regarding industry consolidation and stressed the importance of gathering all available information before making a judgment on ownership rules. On Saturday morning, the class performed an on-site inspection of Gannett's W*USA-TV, located in Washington, DC. Following a station tour, class members completed a sample due diligence list by breaking into smaller groups led by station department heads. Participants were instructed to ask the staff questions as if they were investigating the station for potential purchase. Ardy Diercks, W*USA president and general manager and NAB board member,

and six department heads answered questions regarding the public file, tower maintenance, news and business procedures and sales goals.

On Saturday afternoon Jeanette Tully, former Entravision CFO, spoke about the financial aspects of due diligence and led the class through detailed sample budget spread sheets. Diane Sutter and Ms. Tully then presented a case study that evaluated the financial history of a station. After breaking into mentoring groups, participants were asked to review a series of financial documents. Based on this information, the groups proposed an asking price and provided justification for the amount. On Sunday morning, Mark Fratrik, vice president, BIA Financial Network, wrapped up the weekend by speaking about recent radio and television trends. He reviewed the industry's revenue growth history and gave his projections for the future.

The BLT Fellows

The 2003 class consists of 19 participants, 9 of whom attend as part of the NABEF's scholarship program to promote diversity in broadcasting. Tomorrow's Leaders will profile these members of the class.

Ms. RaMona Alexander

Vice President/General Sales Manager
WHBQ-TV, Cordova, Tennessee

Ramona Clay Alexander is a native of the Deep South — born and raised in Jackson, Mississippi. Her educational background is a by-product of the public school system and Jackson State University (economics and finance).

She is a twelve-year broadcaster beginning her career at WJTV-12, a CBS affiliate, as a junior account executive. She worked her way through the ranks as an account executive, regional account executive, political specialist, local sales manager and interim general sales manager. After seven years, she left Jackson in January 1997 to join WGHP, a FOX O&O, located in High Point, North Carolina. She began as a regional account manager and after four months was promoted to national sales manager. After a successful experience with WGHP, she was promoted to her current position of vice president/general sales manager at WHBQ, a sister station and a FOX O&O, in Memphis.

She is an active member of St. Augustine Catholic Church in Memphis, a member of NAMME and NAACP.

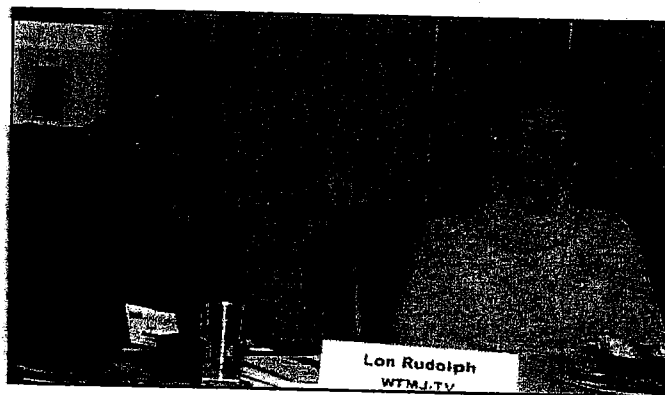
Ms. Julie Brinks

President & CEO,
Vicinity Media Development, Peoria, Illinois

Julie Brinks is currently investigating broadcast properties for purchase. Julie is former vice president, programming and group operations for Four Seasons Broadcasting/Venture Technologies; which owns and operates WAOE-TV, Peoria; KTUD-TV, Las Vegas; WHTV-TV, Lansing; WBQD-TV, Davenport; WAWA-TV, Syracuse; and has a CP for CH 51 in Albany. All stations are UPN affiliates, and have been on-air since February 2000.

Julie has been in the television industry for 20 years, with a broad background of management positions including those in production, promotion, operations and programming management and regional and national sales. She has also held positions as general sales manager and general management.

She holds a BA from Central Michigan University in broadcasting and cinematic arts, and an MBA in leadership studies from Baker Center for Graduate Studies.



Participants Lon Rudolph and Kathy Palmer.

Ms. Trila Bumstead*Vice President of Finance/CFO**New Northwest Broadcasters, Bellevue, Washington*

Trila was born in California and raised in Washington State where she attended the University of Washington and majored in accounting. She was an active member of Beta Alpha Psi (the accounting fraternity) and through that participation was hired as a staff accountant at Deloitte and Touche, LLP in January of 1994. In 1999, she was promoted to audit manager at D&T specializing in hi-tech/manufacturing companies. She worked on several publicly traded and privately held companies that operated in the United States.

She was first introduced to the radio industry in the summer of 1997 when she was assigned to participate on a team charged with Entercom's initial public offering. She managed a small staff that audited the operational performance for two of Entercom's stations owned in Seattle.

The investor group for New Northwest Broadcasters (NNB) recruited her for NNB's CFO position at the end of 1998. She joined NNB as their CFO on February 1, 1999 — just before her 30th birthday. During her time at NNB she has focused on developing the financial reporting infrastructure, centralized reporting, internal controls, capital projects, new station acquisitions, revenue generation programs and expense reduction and management.

Ms. Kathleen Palmer*Director of Engineering**KING-TV, Seattle, WA*

Kathy Palmer is the director of engineering for KING 5 and KONG-TV located in Seattle. Kathy has 23 years of broadcast experience, which was acquired during her 19 years at WLNE-TV (ABC) in Rhode Island and KING (NBC) and KONG-TV (Independent) in Seattle.

When joining KING-TV in 1997 the first order of business was the build out of the facility and the convergence to digital. KING-DT went on the air in digital Sept. 15, 1998.

KONG-TV (also owned by BELO) launched its DT channel May 2002, meeting the FCC time frame. Palmer's areas of responsibility include management of the engineering, operations and the IS staff as well as the station's five year strategic planning and the station's capital and operating budgets.

Prior to joining KING 5, Palmer served as the director of engineering and operations for WLNE. In that role, she supervised a staff of 55 people, implemented the station's capital budget, and supervised the transmitter and newsroom computer system. She also served as WLNE's manager of technical operations from 1994 to 1996, department head operations manager from 1989 to 1994, and as WLNE's engineering operations manager from 1987 to 1989.

Palmer is married with three daughters and enjoys living in the Pacific Northwest. She attended Rhode Island College and the Radio Electronic Institute, and is a member of the Society of Broadcast Engineers.

If you are interested in receiving more information about the program visit www.nabef.org or email hbirks@nab.org.

The Support

The Broadcast Leadership Training Program is made possible by the generous support of the following organizations:

- Belo Corporation
- Benedek Broadcasting Corporation
- CBS Inc.
- Gannett Broadcasting
- Hearst-Argyle Television, Inc.
- LIN Television Corporation
- National Association of Broadcasters
- Morgan Murphy Stations
- NewCity Foundation
- Scripps Howard Broadcasting Co.



NATIONAL ASSOCIATION OF BROADCASTERS EDUCATION FOUNDATION

1771 N Street, NW • Washington, DC 20036

For more information on the NABEF visit www.nabef.org or call (202) 429-5389.

See Week #7 Binder

NABEF Broadcast Leadership Training Program
NAB Headquarters 1771 N Street, NW Washington, DC
March 21-23, 2003

Weekend #7
AGENDA

Friday, March 21

- 6:00-6:30 p.m. Reception
- 6:30-8:00 p.m. Developing a Business Plan for Your Station
Marcellus Alexander, Executive Vice President, NAB

Saturday, March 22

- 8:00-8:30 a.m. Continental Breakfast
- 8:30-9:00 a.m. Preparing for NAB2003
Diane Sutter, President & CEO, Shooting Star Broadcasting
- 9:00-10:45 a.m. Between the Purchase and the License Grant
David Kennedy, President & COO, Susquehanna Radio Corp.
- 10:45-11:00 a.m. Break
- 11:00-1:00 pm New EEO Rules
Gregg Skall, Partner, Womble Carlyle
- 1:00-1:30 p.m. Lunch
- 1:30-3:00 p.m. Performance Management (Employee Handbook, Setting up Health Plans, Employee Retention, Hiring & Firing.....)
Jackie Koscelnik, Partner, DeForest Koscelnik Yokitis & Kaplan
- 3:00-3:15 p.m. Break
- 3:15-5:15 p.m. Performance Management (Employee Handbook, Setting up Health Plans, Employee Retention, Hiring & Firing.....)
Jackie Koscelnik, Partner, DeForest & Koscelnik Yokitis & Kaplan
- 5:15 p.m. Depart for dinner
- 5:30 p.m. Dinner

Sunday, March 23

- | | |
|------------------|--|
| 8:00-8:30 a.m. | Continental Breakfast |
| 8:30-10:00 a.m. | Performance Management (Employee Handbook, Setting up Health Plans, Employee Retention, Hiring & Firing.....)
<i>Jackie Koscelnik, Partner, DeForest & Koscelnik Yokitis & Kaplan</i> |
| 10:00-10:15 a.m. | Break |
| 10:15-12:15 p.m. | Performance Management (Employee Handbook, Setting up Health Plans, Employee Retention, Hiring & Firing.....)
<i>Jackie Koscelnik, Partner, DeForest & Koscelnik Yokitis & Kaplan</i> |
| 12:15-12:30 p.m. | Final Q&A, Housekeeping Announcements/Reminders
Evaluations Turned In |
| 12:30 p.m. | Adjourn for Travel Home |

EEO Regulations for Broadcasters

*A Primer
on
Current FCC Requirements*



Womble Carlyle Sandridge & Rice, PLLC
1401 I Street, NW
Seventh Floor
Washington, DC 20005
(202) 467-6900

EEO REGULATIONS FOR BROADCASTERS

A Primer on Current FCC Requirements

OVERVIEW

The FCC's current equal employment opportunity rules emphasize broad outreach and recruitment. Previous EEO rules attempted to assess the hiring process and the proportion of minorities and women in station staffs, but those approaches were invalidated as unconstitutional schemes that encouraged race-based hiring decisions. The Commission's present method couples a ban on discrimination with specific outreach, record-keeping and reporting requirements. Its premise is that employment opportunity will result from filling full-time jobs only after soliciting candidates from the full community.

This primer is intended to summarize the Commission's EEO rules as they now stand. We also provide worksheets to help organize the information to be collected and placed in the public file, as well as copies of the forms upon which EEO information is to be submitted to the Commission. Please be sure to discuss with communications counsel the application of these requirements to your specific situation. Since the Commission may modify or substantially interpret its rules in the future, you also need to be in a position to become aware of such changes and their impact.

ANTI-DISCRIMINATION

As in the past, the Commission's EEO rules prohibit discrimination on the basis of race, color, religion, national origin or gender. The only exception permits religious radio broadcasters to establish religious belief or affiliation as a job qualification for all of their station employees. The Commission will continue to defer resolution of individual complaints of employment discrimination to the Equal Employment Opportunity Commission, courts and state and local governmental agencies. However, the Commission reserves the right to take its own action "where the facts of a particular case so warrant," although it has not yet explained the circumstances that might trigger such direct concern.

SCOPE OF THE EEO RULES

The Commission's EEO rules apply to all broadcast "station employment units" with five or more full-time employees. A station employment unit includes all commonly-owned stations in the same market if they share even a single employee. Full-time employees are those whose regular work schedule is 30 hours or more per week. Although employment units having fewer than five full-time employees are not subject to

formal outreach and recruitment requirements, they still must comply with the anti-discrimination policy noted above. At present, the new rules apply only to full-time positions, although the Commission is considering the extent to which these or modified rules should apply to part-time employment as well. Licensees and brokers of time-brokered stations each must apply the Commission's EEO requirements with respect to their own employees.

RECRUITMENT

Broadcasters must recruit for nearly all full-time vacancies. There are only two recognized exceptions. The first is for exigent circumstances, generally limited to the need to replace immediately an employee who departs without notice where his or her duties cannot be fulfilled, even briefly, by other staff, or where a preferred hiree has a talent so unique and exceptional that no comparable candidate is likely to be found. The Commission has cautioned that such circumstances should be quite rare. The other exception is for internal promotions and for temporary employees (defined as emergency replacements for absent regular employees or those hired to perform a particular job for a limited period of time). However, if an employee is promoted, a temporary employee is moved into a permanent slot or a part time employee is made full-time, then recruitment either must have been undertaken upon initial hiring or at the time of such a promotion.

Broadcasters are required to develop and use recruitment sources sufficient to ensure wide dissemination of information about each full-time job opening throughout the entire community. The Commission affords broadcasters substantial discretion to define the relevant recruitment "community" in light of the station's technical coverage, marketing and advertising practices, listenership and the flow of requests for job vacancy notices from area groups. The choice of particular recruitment sources is not prescribed, and need not necessarily be targeted specifically to minorities, women or any other group, so long as, when taken as a whole, the sources used are reasonably calculated to reach the entire community. Sources oriented toward the local community may be supplemented with regional and national sources as well as joint recruitment efforts. Licensees may also rely upon a pool of previously recruited candidates for similar positions and a certain degree of word-of-mouth. However, while Internet access is increasing, the Commission does not yet consider on-line job databases to be effective as primary recruitment sources.

NOTIFICATION UPON REQUEST

Employers must provide information of full time job vacancies upon the request of any organization involved in assisting job seekers. This is intended as a "safety valve" to ensure that no segment of the community is inadvertently overlooked in recruitment efforts. To become eligible, an organization merely must provide a broadcaster with its name and contact information. The Commission expects broadcasters to publicize their interest in receiving notification requests so that qualified groups are able to learn of the

procedure. Beyond individual publicity efforts, including website notices, newspaper ads, press releases and on-air spots, the Commission recognizes the value of joint announcements by area broadcasters or state associations.

SUPPLEMENTAL INITIATIVES

Broadcasters are required to engage in a specified number of recruitment initiatives within each two year period. Two activities are required for employment units with five to 10 full-time employees or if they are located in a smaller market. Four activities are required for all others. A station is in a "smaller market" if it is located in a county outside of all metropolitan areas (as defined by the Office of Management and Budget) or in a metropolitan area with a population under 250,000. The relevant two-year period begins on the due date for a station's renewal application, and every two years thereafter. Activities for the first period or for a period during which a station is acquired, if less than two years, may be prorated.

The purpose of these activities is to create a general interest in broadcast employment, rather than recruitment for specific positions. There are now 16 qualified activity options which are detailed on Page 11. They include job fairs, job banks, internship programs, scholarships, mentoring, employee and management training programs, media trade group listings, assisting outside non-profit career development entities, and a catch-all of "participating in other activities designed by the station employment unit reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities." The activities may be performed on a joint basis with other area broadcasters, state organizations or co-owned stations, so long as each participant has meaningful involvement in the activity.

RECORD-KEEPING REQUIREMENTS

Employment units must be able to document compliance with the Commission's EEO requirements. The rules require that the following information be collected:

- The job title and date of all full-time hires;
- The name, address, contact person and telephone number of each recruitment source used to fill each full-time vacancy (including all organizations entitled to automatic notification);
- Dated copies of all advertisements, bulletins, letters, faxes, emails or other communications announcing full-time vacancies;
- Documentation necessary to demonstrate performance of supplemental outreach initiatives, including full disclosure of the nature of the activity, the scope of the station's participation and station personnel involved; and
- The total number of interviewees for each full-time vacancy and the referral source for each interviewee and hiree.

All these materials are to be retained until after grant of the renewal application for the term during which the vacancy was filled or the activity occurred. However, records for activity prior to a license assignment or transfer of control need not be kept by the new entity (unless specifically required under the terms of a grant). Records need not be submitted routinely to the FCC (except as noted below), but must be available upon Commission request.

PUBLIC FILE

On each anniversary of the date of filing a renewal application, broadcasters must place in their local public inspection files (and post on their websites, if they have one) the following information covering hiring and activities during the preceding year:

- The job title of all full-time hires;
- The name, address, contact person and telephone number of each recruitment source used to fill each vacancy (including each organization entitled to automatic notification);
- The recruitment source that referred each full-time hiree;
- The total number of interviewees for each full-time vacancy and the number of interviewees referred by each recruitment source; and
- A list and brief description of each outreach initiative undertaken.

These materials are to be maintained in the public file until grant of the next renewal or license assignment.

FCC REPORTS AND FILINGS

All applications for new stations, license assignments and transfers of control will include a prospective EEO program on FCC Form 396-A. License renewal applications will require a report on FCC Form 396 describing all pending or resolved EEO complaints and, for stations having five or more full-time employees, the name and title of the person responsible for implementation, a narrative statement of the station's efforts to achieve broad and inclusive outreach during the previous two years, and a copy of the two most recent annual EEO public file reports. On the fourth anniversary of their renewal filing, radio employment units having 11 or more full-time employees and television employment units having 10 or more full-time employees must submit mid-term reports on FCC Form 397 including their two most recent public file reports and the name and title of the person responsible for EEO implementation.

The Commission has not reinstated its former annual employment report (FCC Form 395-B), which had required the race and gender of each full- and part-time employee according to job category. However, the Commission is considering using this or a similar form in order to compile industry-wide statistics, rather than to assess an individual entity's degree of compliance.

MONITORING AND ENFORCEMENT

Upon receipt of information as to possible violations, the Commission may launch targeted investigations. In addition, each year it intends to select five percent of radio and television licensees for random audits which may entail additional documentation of recruitment efforts beyond the material required for the public file. Actionable violations or deficiencies would include engaging in employment discrimination, failing to file reports or comply with the Commission's EEO requirements or attempting to evade FCC requirements through token or sham efforts. A range of sanctions and remedies will be available from admonishments through reporting conditions, forfeitures, short term renewals and hearing designation seeking renewal denial or license revocation. Although remedies and sanctions are to be determined on a case-by-case basis, they are to be most severe in cases involving recidivism, continuous non-compliance or intentional discrimination.

EFFECTIVE DATE

The new rules are effective March 10, 2003. Records of activities undertaken prior to that time are not required.

SUMMARY OF RECRUITMENT RESPONSIBILITIES

- ***Commencing on March 10, 2003*** – Begin publicity to notify organizations in the community that they may request notification of job vacancies.
 - o Attach documentation of notification efforts to the Documentation of Publicity of New Notification Procedure cover sheet (Page 9).
 - o Each time an organization responds with a request for notifications, complete a Record Sheet of Organizations Requesting Notice of Job Vacancies (Page 10).
- ***Commencing on March 10, 2003*** – Elect and plan supplemental outreach efforts.
 - o Specify your choices on the Election of Supplemental Outreach Initiatives worksheet (Page 11).
 - o Keep documentation of chosen supplemental outreach efforts as each progresses and is accomplished; attach such documentation to the Description of Supplemental Outreach Initiatives worksheet (Page 12):
- ***Each time a full-time vacancy occurs*** – Widely disseminate information to the community.
 - o Save copies of tear sheets of newspaper advertisements, letters, e-mails and faxes sent to organizations and employment agencies, and orders for on-air job spots, as applicable, for every vacancy.
 - o Compile the List of Recruitment Sources to Fill Each Vacancy (Page 15).
- ***After each interview or hire*** – Complete the Interviewee/Hiree Record Sheet (Page 13) for every person interviewed for each vacancy.
- ***On an ongoing basis for each full time vacancy*** – Use the Interviewee/Hiree Record Sheet (Page 13) to compile the Tally of Interviewee Sources For Each Full-Time Vacancy (Page 16). Add the job to the List of All Full-Time Jobs Filled (Page 14).

- ***Determine the renewal filing due date for your station from the charts on pages 19-21. On each anniversary:***
 - Complete the Yearly Total Number of Interviewees and Total Number of Interviewees Referred by Each Recruitment Source (Page 17) for the preceding year using the Tally of Interviewee Sources For Each Full-Time Vacancy (Page 16).
 - Use the Description of Supplemental Outreach Initiatives worksheets (Page 12) to compile the Summary Description of Supplemental Outreach Initiatives (Page 18).
 - Place the following EEO materials into the station's local public file and post on the station's website, if applicable:
 - List of All Full-Time Jobs Filled (Page 14)
 - List of Recruitment Sources Used to Fill Each Vacancy (Page 15)
 - Description of Supplemental Outreach Initiatives (Page 12)
 - Yearly Total Number of Interviewees and Total Number of Interviewees Referred by Each Recruitment Source (Page 17)
 - Summary Description of Supplemental Outreach Initiatives (Page 18).

EEO WORKSHEETS

The attached EEO worksheets are designed to assist broadcast stations in complying with the Commission's current EEO rules, policies, and record-keeping requirements. By incorporating the use of these, or similar, worksheets into your station's operating procedures, you should be able to compile the data necessary to comply with the Commission's EEO rules and policies.

- Documentation of Publicity of New Notification Procedure (Page 9)
- Record Sheet of Organizations Requesting Notice of Job Vacancies (Page 10)
- Election of Supplemental Outreach Initiatives (Page 11)
- Description of Supplemental Outreach Initiatives (Page 12)
- Interviewee/Hiree Record Sheet (Page 13)
- List of All Full-Time Jobs Filled (Page 14)
- List of Recruitment Sources Used to Fill Each Vacancy (Page 15)
- Tally of All Interviewee Sources for Each Full-Time Vacancy (Page 16)
- Yearly Total Number of Interviewees and Total Number of Interviewees Referred by Each Recruitment Source (Page 17)
- Summary Description of Supplemental Outreach Initiatives (Page 18)

**DOCUMENTATION OF PUBLICITY OF
NEW NOTIFICATION PROCEDURE**

*Attach to this cover sheet dated documentation of notices sent to organizations to inform them of the new notice procedures for receiving notification of job vacancies (e.g., text of announcements broadcast on-air, newspaper and/or other periodical advertisements, web pages, e-mails, faxes). This is for your own records and for FCC inspection, if requested – do **NOT** place in your public file.*

**RECORD SHEET OF ORGANIZATIONS
REQUESTING NOTICE OF JOB VACANCIES**

Complete this worksheet every time an organization requests notification of job vacancies

Name of Organization: _____

Date of Initial Request: _____

Type of Notifications Requested: _____

☐ All Jobs

☐ Specific Jobs (indicate which) _____

Name of Contact: _____

Address: _____

Phone Number: _____ Fax Number: _____

E-mail address (optional): _____

Form Prepared By: _____ Date: _____

Attach dated copies of notices provided to organizations each time there is a station job vacancy (e.g., letters, e-mails, faxes, etc), and keep in station files (NOT local public file) for FCC inspection, if requested.

ELECTION OF SUPPLEMENTAL OUTREACH INITIATIVES

Complete this form every second year following your renewal due date.

Form Prepared By: _____ Date: _____

1.	Participation in at least four job fairs by station personnel who have substantial responsibility in the making of hiring decisions
2.	Hosting of at least one job fair
3.	Co-sponsoring at least one job fair with organizations in the business and professional community whose memberships include substantial participation of women and minorities
4.	Participation in at least four events sponsored by community groups active in broadcast employment issues (conventions, career days, workshops and similar activities)
5.	Establishment of an intern program designed to assist members of the community to acquire skills needed for broadcast employment
6.	Participation in job banks, internet programs and other programs designed to promote outreach generally (programs not primarily directed to providing notification of specific job vacancies)
7.	Participation in scholarship programs designed to assist students interested in pursuing a career in broadcasting
8.	Establishment of training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions
9.	Establishment of a mentoring program to enable station personnel to improve their skills to qualify for higher positions
10.	Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting
11.	Sponsorship of at least two events in the community designed to increase public awareness as to employment opportunities in broadcasting
12.	Listing of each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities
13.	Provision of assistance to unaffiliated non-profit entities and the maintenance of websites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting.
14.	Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination.
15.	Provision of training to personnel of unaffiliated non-profit organizations interested in broadcast employment opportunities that would enable them to better refer job candidates for broadcast positions.
16.	Participation in other activities designed by the station employment unit that are reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities

This form is for internal use only. Use it to select activities for which a "Description of Supplemental Outreach Activities" worksheet (Page 12) will be compiled.

DESCRIPTION OF SUPPLEMENTAL OUTREACH INITIATIVES

Complete this form for every event or program established by, sponsored by, or participated in by the station employment unit as part of each Supplemental Outreach Initiative (Page 11) elected.

Date(s) of Initiative Event(s): _____

Describe Nature of Initiative: _____

Describe Scope of Broadcasters' Participation (including names of any other sponsoring or participating organizations): _____

Names of Station Personnel Involved in Initiative: _____

Form Prepared By: _____ Date: _____

Attach copies of documentation demonstrating performance of chosen initiatives (e.g., pamphlets, advertisements, letters, e-mails, faxes) .

Use these worksheets to compile the annual Summary Description of Supplemental Outreach Initiatives (page 18).

INTERVIEWEE/HIREE RECORD SHEET

Complete this worksheet for every applicant interviewed for any full time vacancy.

Name of Interviewee/Hiree: _____

Date(s) of Interview(s): _____

Job Title of Vacancy: _____

Recruitment Referral Source: _____

Hired? YES ____ NO ____

If YES, Date of Hire: _____

Form Prepared By: _____ Date: _____

Use this worksheet to compile Tally of Interviewee Sources For Each Full-Time Vacancy (Page 16).

Keep in station's internal files to document compliance if required by the FCC.

**LIST OF ALL FULL-TIME JOBS FILLED
FOR THE 12 MONTH PERIOD OF _____, 200_ through _____, 200_**

Complete this worksheet continuously every time a vacancy is filled

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Job Title: _____ Date Filled: _____

Place in station's local public file annually on the anniversary date of the renewal filing due date. Post on station's website, if applicable.

LIST OF RECRUITMENT SOURCES USED TO FILL EACH VACANCY

Complete this worksheet after filling a full time vacancy. Use as many copies as are necessary. Include organizations requesting notice of vacancy.

Job Title for Vacancy: _____ **Date Vacancy Filled:** _____

Recruitment Source for Actual Hire: _____

* * * * *

RECRUITMENT SOURCES UTILIZED FOR THIS VACANCY

Name and Address of Source	Contact Person and Phone Number

Place in station's local public file annually on the anniversary date of the renewal filing due date. Post on station's website, if applicable.

**TALLY OF INTERVIEWEE SOURCES
FOR EACH FULL-TIME VACANCY**

Complete this worksheet for each full-time vacancy.

Job Title for Vacancy: _____ **Date Vacancy Filled:** _____

Recruitment Source	Number of Interviewees Referred by Source

Use these forms for internal purposes only in order to determine the total number of interviewees, as well as the total number of interviewees referred by each recruitment source. Use the results to complete the "Yearly Total number of Interviewees and Total Number of Interviewees Referred by Each Recruitment source" sheet (Page 17)

**YEARLY TOTAL NUMBER OF INTERVIEWEES
AND TOTAL NUMBER OF INTERVIEWEES REFERRED BY EACH
RECRUITMENT SOURCE**

Complete this worksheet on the anniversary date of the renewal filing due date using the Tally of Interviewee Sources for Each Full-Time Vacancy (Page 16)

Yearly Period Beginning: _____ Ending: _____

Total Number of Persons Interviewed for Full-Time Vacancies: _____

* * * * *

Total Number of Interviewees Referred by Each Recruitment Source:

Recruitment Source Name	Total Number of Interviewees

Place in station's local public file annually on the anniversary date of the renewal filing due date. Post on station's website, if applicable.

**SUMMARY DESCRIPTION OF
SUPPLEMENTAL OUTREACH INITIATIVES**

Complete this form to summarize the activities compiled on the Description of Supplemental Outreach Initiatives worksheets (page 16). Stations required to engage in four initiatives should use an additional sheet to include remaining initiatives.

2/4 YEAR PERIOD BEGINNING _____, 200__ AND ENDING _____, 200__

Specify First Initiative: _____

Describe activities undertaken to fulfill that initiative:

Specify Second Initiative: _____

Describe activities undertaken to fulfill that initiative:

Place in the public file and post on the station's website annually on the anniversary of the renewal filing date.

RENEWAL FILING DATES FOR RADIO AND TELEVISION STATIONS

STATE	RADIO	TELEVISION
ALABAMA	DECEMBER 1, 2003 Last Renewal Filed 12/1/95	DECEMBER 2, 2004 Last Renewal Filed 12/2/96
ALASKA	OCTOBER 3, 2005 Last Renewal Filed 10/1/97	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
ARIZONA	JUNE 2, 2005 Last Renewal Filed 6/2/97	JUNE 1, 2006 Last Renewal Filed 6/1/98
ARKANSAS	FEBRUARY 2, 2004 Last Renewal Filed 2/1/96	FEBRUARY 3, 2005 Last Renewal Filed 2/3/97
CALIFORNIA	AUGUST 1, 2005 Last Renewal Filed 8/1/97	AUGUST 3, 2006 Last Renewal Filed 8/3/98
COLORADO	DECEMBER 2, 2004 Last Renewal Filed 12/2/96	DECEMBER 1, 2005 Last Renewal Filed 12/1/97
CONNECTICUT	DECEMBER 1, 2005 Last Renewal Filed 12/1/97	DECEMBER 1, 2006 Last Renewal Filed 12/1/98
DELAWARE	APRIL 3, 2006 Last Renewal Filed 4/1/98	APRIL 2, 2007 Last Renewal Filed 4/1/99
DISTRICT OF COLUMBIA	JUNE 2, 2003 Last Renewal Filed 6/1/95	JUNE 3, 2004 Last Renewal Filed 6/3/96
FLORIDA	OCTOBER 1, 2003 Last Renewal Filed 10/2/95	OCTOBER 1, 2004 Last Renewal Filed 10/1/96
GEORGIA	DECEMBER 1, 2003 Last Renewal Filed 12/1/95	DECEMBER 2, 2004 Last Renewal Filed 12/2/96
GUAM	OCTOBER 3, 2005 Last Renewal Filed 10/1/97	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
HAWAII	OCTOBER 3, 2005 Last Renewal Filed 10/1/97	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
IDAHO	JUNE 2, 2005 Last Renewal Filed 6/2/97	JUNE 1, 2006 Last Renewal Filed 6/1/98
ILLINOIS	AUGUST 2, 2004 Last Renewal Filed 8/1/96	AUGUST 1, 2005 Last Renewal Filed 8/1/97
INDIANA	APRIL 1, 2004 Last Renewal Filed 4/1/96	APRIL 1, 2005 Last Renewal Filed 4/1/97
IOWA	OCTOBER 1, 2004 Last Renewal Filed 10/1/96	OCTOBER 3, 2005 Last Renewal Filed 10/1/97
KANSAS	FEBRUARY 3, 2005 Last Renewal Filed 2/3/97	FEBRUARY 2, 2006 Last Renewal Filed 2/2/98
KENTUCKY	APRIL 1, 2004 Last Renewal Filed 4/1/96	APRIL 1, 2005 Last Renewal Filed 4/1/97
LOUISIANA	FEBRUARY 2, 2004 Last Renewal Filed 2/1/96	FEBRUARY 3, 2005 Last Renewal Filed 2/3/97
MAINE	DECEMBER 1, 2005 Last Renewal Filed 12/1/97	DECEMBER 1, 2006 Last Renewal Filed 12/1/98

STATE	RADIO	TELEVISION
MARIANA ISLANDS	OCTOBER 3, 2005 Last Renewal Filed 10/1/97	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
MARYLAND	JUNE 2, 2003 Last Renewal Filed 6/1/95	JUNE 3, 2004 Last Renewal Filed 6/3/96
MASSACHUSETTS	DECEMBER 1, 2005 Last Renewal Filed 12/1/97	DECEMBER 1, 2006 Last Renewal Filed 12/1/98
MICHIGAN	JUNE 2, 2004 Last Renewal Filed 6/2/96	JUNE 2, 2005 Last Renewal Filed 6/2/97
MINNESOTA	DECEMBER 2, 2004 Last Renewal Filed 12/2/96	DECEMBER 1, 2005 Last Renewal Filed 12/1/97
MISSISSIPPI	FEBRUARY 2, 2004 Last Renewal Filed 2/1/96	FEBRUARY 3, 2005 Last Renewal Filed 2/3/97
MISSOURI	OCTOBER 1, 2004 Last Renewal Filed 10/1/96	OCTOBER 1, 2005 Last Renewal Filed 10/1/97
MONTANA	DECEMBER 2, 2004 Last Renewal Filed 12/2/96	DECEMBER 3, 2005 Last Renewal Filed 12/1/97
NEBRASKA	FEBRUARY 3, 2005 Last Renewal Filed 2/3/97	FEBRUARY 2, 2006 Last Renewal Filed 2/2/98
NEW HAMPSHIRE	DECEMBER 1, 2005 Last Renewal Filed 12/1/97	DECEMBER 1, 2006 Last Renewal Filed 12/1/98
NEVADA	JUNE 2, 2005 Last Renewal Filed 6/2/97	JUNE 1, 2006 Last Renewal Filed 6/1/98
NEW JERSEY	FEBRUARY 2, 2006 Last Renewal Filed 2/2/98	FEBRUARY 1, 2007 Last Renewal Filed 2/1/99
NEW MEXICO	JUNE 2, 2005 Last Renewal Filed 6/2/97	JUNE 1, 2006 Last Renewal Filed 6/1/98
NEW YORK	FEBRUARY 2, 2006 Last Renewal Filed 2/2/98	FEBRUARY 1, 2007 Last Renewal Filed 2/1/99
NORTH CAROLINA	AUGUST 1, 2003 Last Renewal Filed 8/1/95	AUGUST 2, 2004 Last Renewal Filed 8/1/96
NORTH DAKOTA	DECEMBER 2, 2004 Last Renewal Filed 12/2/96	DECEMBER 1, 2005 Last Renewal Filed 12/1/97
OHIO	JUNE 3, 2004 Last Renewal Filed 6/3/96	JUNE 2, 2005 Last Renewal Filed 6/2/97
OKLAHOMA	FEBRUARY 3, 2005 Last Renewal Filed 2/3/97	FEBRUARY 2, 2006 Last Renewal Filed 2/2/98
OREGON	OCTOBER 3, 2005 Last Renewal Filed 10/2/97	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
PENNSYLVANIA	APRIL 1, 2006 Last Renewal Filed 4/1/98	APRIL 2, 2007 Last Renewal Filed 4/1/99
PUERTO RICO	OCTOBER 1, 2003 Last Renewal Filed 10/1/95	OCTOBER 1, 2004 Last Renewal Filed 10/1/96
RHODE ISLAND	DECEMBER 1, 2005 Last Renewal Filed 12/1/97	DECEMBER 1, 2006 Last Renewal Filed 12/1/98

STATE	RADIO	TELEVISION
SAIPAN	OCTOBER 3, 2005 Last Renewal Filed 10/1/98	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
SAMOA	OCTOBER 3, 2005 Last Renewal Filed 10/1/97	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
SOUTH CAROLINA	AUGUST 1, 2003 Last Renewal Filed 8/1/95	AUGUST 2, 2004 Last Renewal Filed 8/1/96
SOUTH DAKOTA	DECEMBER 2, 2004 Last Renewal Filed 12/2/96	DECEMBER 1, 2005 Last Renewal Filed 12/1/97
TENNESSEE	APRIL 1, 2004 Last Renewal Filed 4/1/96	APRIL 1, 2005 Last Renewal Filed 4/1/97
TEXAS	APRIL 1, 2005 Last Renewal Filed 4/1/97	APRIL 3, 2006 Last Renewal Filed 4/1/98
UTAH	JUNE 2, 2005 Last Renewal Filed 6/2/97	JUNE 1, 2006 Last Renewal Filed 6/1/98
VERMONT	DECEMBER 1, 2005 Last Renewal Filed 12/1/97	DECEMBER 1, 2006 Last Renewal Filed 12/1/98
VIRGIN ISLANDS	OCTOBER 1, 2003 Last Renewal Filed 10/2/95	OCTOBER 1, 2004 Last Renewal Filed 10/1/96
VIRGINIA	JUNE 2, 2003 Last Renewal Filed 6/1/95	JUNE 3, 2004 Last Renewal Filed 6/3/96
WASHINGTON	OCTOBER 3, 2005 Last Renewal Filed 10/1/97	OCTOBER 2, 2006 Last Renewal Filed 10/1/98
WISCONSIN	AUGUST 2, 2004 Last Renewal Filed 8/1/96	AUGUST 1, 2005 Last Renewal Filed 8/1/97
WEST VIRGINIA	JUNE 2, 2003 Last Renewal Filed 6/1/95	JUNE 3, 2004 Last Renewal Filed 6/3/96
WYOMING	JUNE 2, 2005 Last Renewal Filed 6/2/97	JUNE 1, 2006 Last Renewal Filed 6/1/98

FCC EEO FORMS

The FCC has adopted the attached forms, which will need to be completed and submitted as follows:

- **FCC Form 396-A – Broadcast Equal Employment Opportunity Model Program Report (Page 23)** – To be completed by applicants for new broadcast stations, assignments of licenses and transfers of control of broadcast licensees or controlling entities.
- **FCC Form 396 – Broadcast Equal Employment Opportunity Program Report (Page 27)** – To be filed with every application for renewal of a broadcast station license.
- **FCC Form 397 – Broadcast Mid-Term Report (Page 31)** – To be completed after the fourth year of each broadcast license term.

Please note: As of this writing, these forms have not yet been approved for use by the Office of Management and Budget. Although approval is likely, the attachments are prototypes and are provided for information only. Be sure to prepare and submit the current, approved versions of these forms.

Federal Communications Commission

FCC 02-303

Federal Communications Commission
Washington, D. C. 20554NOT Approved by OMB
3060-0120BROADCAST EQUAL EMPLOYMENT OPPORTUNITY
MODEL PROGRAM REPORT

Legal Name of the Applicant		
Mailing Address		
City	State or Country (if foreign address)	ZIP Code
Telephone Number (include area code)	E-Mail Address (if available)	
	Facility ID Number	Call Sign

☐ Application for Construction Permit for New Station
 ☐ Application for Assignment of License

☐ Application for Transfer of Control

 a. Service Type: ☐ AM ☐ FM ☐ TV ☐ Other (specify)

 b. Community of License:

City	State
------	-------

INSTRUCTIONS

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to ensure equal employment opportunity. This is submitted to the Commission as the Model EEO Program. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

Guidelines for a Model EEO Program and a Model EEO Program are attached.

NOTE: Check appropriate box, sign the certification below and return to FCC:

Station employment unit will employ fewer than 5 full-time employees; therefore no written program is being submitted.

Station employment unit will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed	Name of Respondent
Title	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

FCC 396-A
October 2002

GUIDELINES TO THE MODEL EEO PROGRAM

The model EEO program adopted by the Commission for construction permit applicants, assignees, and transferees contains five sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

I. GENERAL POLICY

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified persons.

II. RESPONSIBILITY FOR IMPLEMENTATION

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

III. POLICY DISSEMINATION

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station, in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

V. RECRUITMENT

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified job applicants. The purpose of the listing is to assist the applicant in developing specialized referral sources to ensure wide dissemination of vacancy information as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and new sources should be sought.

MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM**I. GENERAL POLICY**

It will be our policy to provide equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

Federal Communications Commission

FCC 02-303

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

II. RESPONSIBILITY FOR IMPLEMENTATION

Name/Title

will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To ensure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

- ☐ The station's employment application forms will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☐ Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☐ We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.
- ☐ Other (specify)

IV. RECRUITMENT

To ensure that information concerning each full-time vacancy is widely disseminated, we propose to use the following list of recruitment sources consistent with the requirements of 47 C.F.R. Section 73.2080:

Federal Communications Commission

FCC 02-303

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the Federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to those agencies through the matching of computer records when authorized. If you do not provide the information requested on this report, the report may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authority. We have estimated that each response to this collection of information will average 1 hour. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0120), Washington, D. C. 20534. We will also accept your comments via the Internet if you send them to Policy@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0120.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(c)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1994, 44 U.S.C. 3507.

Federal Communications Commission

FCC 02-303

Federal Communications Commission
Washington, D. C. 20554Approved by OMB
3060-0113**BROADCAST EQUAL EMPLOYMENT
OPPORTUNITY PROGRAM REPORT**

(To be filed with broadcast license renewal application)

(For FCC Use Only)

Code No.

Legal Name of the Licensee		
Mailing Address		
City	State or Country (if foreign address)	ZIP Code
Telephone Number (include area code)	E-Mail Address (if available)	
Facility ID Number	Call Sign	

TYPE OF BROADCAST STATION :

Commercial Broadcast Station

Noncommercial Broadcast Station

☐ Radio ☐ TV☐ Educational Radio

Low Power TV

☐ Educational TV

International

List call sign and location of all stations included on this report. List commonly owned stations that share one or more employees. Also list stations operated by the licensee pursuant to a time brokerage agreement. Indicate on the table below which stations are operated pursuant to a time brokerage agreement. To the extent that licensees include stations operated pursuant to a time brokerage agreement on this report, responses or information provided in Sections I through IV should take into consideration the licensee's EEO compliance efforts at brokered stations, as well as any other stations, included on this form. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

Call Sign	Facility ID Number	Type (check applicable box)	Location (city, state)	Time Brokerage Agreement (check applicable box)
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No

FCC 396
October 2003

Gregg SKALL

Member

Womble Carlyle Sandridge & Rice, PLLC

Washington, District of Columbia

Mr. Skall actively represents telecommunications companies in domestic and international telecommunications enterprises in their regulatory matters and business dealings. He represents real estate developers in the acquisition of competitive broadband local exchange (CLEC) telecommunications services for new residential and commercial developments. He also works with telecommunications equipment manufacturers to obtain FCC approvals and to assure regulatory compliance. He assists companies in need of appropriate spectrum support for emerging telecommunications products and has been recognized by the National Journal as one of the leading radio spectrum lobbyists in Washington.

Mr. Skall regularly represents broadcasting stations in their regulatory dealings with the Federal Communications Commission in their commercial business dealings. Mr. Skall has orchestrated scores of broadcast property transactions involving assets worth millions of dollars. He has supervised the formation of an international joint venture for a nationwide data network and conceived and directed the successful campaign of the Daytime Broadcaster's Association to expand hours of operation. He organized the coalition of radio broadcasters to obtain major policy changes before the FCC concerning the main studio rule and has represented FM subcarrier users for non-broadcast applications such as paging, since the industry began with Commission rule changes more than a decade ago. He frequently represents parties before the Commission and the Congress to obtain desired policy objectives.

Mr. Skall has served on the Pike and Fischer Communications Regulation Advisory Board since its formation, the leading communications law legal research library in Washington, D.C. He is a recognized writer and frequent speaker on topics of FCC administrative process, mass media, and telecommunications regulation, and has taught Telecommunications Law and Policy at The George Washington University in Washington, D.C. He is communications counsel to the California, Minnesota, Missouri and Nevada state broadcasters associations and writes columns for several state broadcasting association newsletters.

His previous positions include managing partner of Pepper & Corazzini, LLP, chief counsel for the National Telecommunications and Information Administration in the U.S. Department of Commerce and acting general counsel to the White House Office of Telecommunications Policy in the Executive Office of the President.

He is a member of the American Bar Association, District of Columbia Bar Association; Federal Bar Association, Chairman, Telecommunications Committee, 1982, Chairman,

Regulated Industries Committee, 1979-1981; Federal Communications Bar Association, Member Professional Responsibility Committee.

He was admitted to the bar Ohio bar in 1969, District of Columbia bar in 1971 and the U.S. Supreme Court in 1977.

He received his law degree from the University of Cincinnati in 1969 and his undergraduate degree from Ohio State University in 1966.